

**Nutter, McClennen & Fish, LLP**

Seaport West  
 155 Seaport Boulevard  
 Boston, MA 02210-2604  
 (617) 439-2000

Client No.: 0104614

December 12, 2012

Resp. Atty.: PJA

Bill No. 445316/03SLW

Sovereign Bank New England  
 75 State Street  
 Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through November 30, 2012 in connection with the following:

**Matter Name: Global Broadcasting of Southern New England LLC**  
**Matter No.: 00051**

**Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)****Cost Center: 8413 - Other LLB Workout**

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
11/01/12	Review court decision granting motion to amend; finalize and file amended complaint; email to R. Gallup about written discovery	JDP	1.10
11/01/12	Attention to email regarding Roger Rubin, counsel to S. O'Brien; review order entered by the court granting Motion to Amend Complaint; review email from J. Bowen; review emails from S. Bovarnick and M. Russo; attention to monthly update; attention to Notice of Pendency of California action; conference call regarding California actions	JFC	1.20
11/02/12	Draft Second Request for Production	RHG	1.90
11/02/12	Attention to monthly update; review multiple emails from S. Bovarnick regarding Sovereign vs. Morgan Estates, LLC; attention to discovery matters; follow up with S. Bovarnick regarding items to be addressed in California actions	JFC	2.10
11/03/12	Draft second request for production of documents	JDP	3.00
11/04/12	Draft opposition to motion to amend counterclaim	JDP	2.60
11/05/12	Conference with Dana Scheer and Sonja Thadhari and Bailard regarding subpoena; Review correspondence from Union Bank and voicemail; edits to opposition to motion to amend; prepare monthly litigation update; review motion to quash and legal research regarding same; attention to emails; notes regarding agenda items and upcoming tasks	JDP	2.90

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11/05/12	Attention to issue of subpoena for Cox Communications; review response to subpoena issued to Union Bank; review emails from S. Bovarnick regarding Motion to Quash; attention to interspousal deed issue; attention to documents requested to be produced by Bailard; email regarding same; attention to monthly update for Sovereign Bank	JFC	2.70
11/06/12	Revise opposition to motion to amend; check N.D. Cal. docket; draft opposition to motion to quash; further research in support of motion to quash; call with Union Bank and follow-up email regarding Bailard	JDP	1.00
11/06/12	Attention to emails; review motion to quash; review case law sent by S. Bovarnick regarding proper jurisdiction for filing motion to quash; follow up regarding subpoenas; develop strategy for deposition of K. O'Brien, S. O'Brien and broker; review response from D. Scheer regarding Bailard response to subpoena	JFC	2.20
11/07/12	Draft opposition to motion to quash; finalize opposition to motion to amend and file; emails with Bovarnick; telephone conference with J. Bowen	JDP	6.10
11/07/12	Review outstanding agenda items to be completed regarding motion to quash; subpoenas to be served; responses to subpoenas to date; review of discovery produced by K. O'Brien; review email from J. Bowen; review emails from S. Bovarnick; review email from J. Dorsey; review second document request; review opposition to motion to quash	JFC	2.50
11/08/12	Finalize and file opposition to motion to quash; draft subpoenas; telephone conference with S. Bovarnick regarding discovery; draft amended Rule 26 disclosures; draft interrogatories; telephone conference with J. Dorsey	JDP	4.10
11/08/12	Attention to interrogatories; review email from S. Bovarnick; review opposition to Motion to Quash; revise same; attention to deposition of K. O'Brien; review emails regarding avoidance of service of process; review memo in support of opposition to Motion to Quash	JFC	2.70

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT  
FEDERAL TAX ID: 04-2106505

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11/09/12	E-mails concerning O'Brien's hiring of California counsel; finalize and serve document requests, interrogatories and notice of deposition; subpoena to Steve Rice	JDP	2.00
11/09/12	Attention to interrogatories; review updated docket; attention to deposition of K. O'Brien; attention to emails regarding subpoenas from S. Bovarnick; attention to emails regarding refusal to accept service of process by S. O'Brien	JFC	1.80
11/10/12	Review email from D. Cerveny regarding motion to quash; attention to emails to S. Bovarnick; review email regarding criminal attorney representing S. O'Brien	JFC	0.60
11/12/12	Draft subpoena to Steve Rice; emails with S. Bovarnick	JDP	1.70
11/12/12	Attention to file; email regarding J. Bowen deposition; review email from S. Bovarnick; attention to O'Brien litigation summary	JFC	1.00
11/13/12	Prepare for meeting with John Bowen regarding deposition; meet with John Bowen	JDP	3.50
11/13/12	Review order entered by court regarding hearing on Motion to Amend Complaint; follow up regarding same; review email from M. Boersch; email from S. Bovarnick; review email from D. Cerveny	JFC	1.20
11/14/12	Attention to preparation for Monday hearing; emails with Russo regarding O'Brien's deposition; research documents in preparation for Bowen deposition; review answer and counterclaim and research potential motion to strike	JDP	1.10
11/14/12	Review email from M. Russo; attention to logistical issues with K. O'Brien's deposition; emails from S. Bovarnick; attention to letter to the court; edit same; attention to answer to amended complaint; review counterclaim filed by K. O'Brien; attention to file regarding hearing on Monday; telephone call regarding hearing on motion to quash subpoena	JFC	3.50
11/15/12	Defend John Bowen's deposition; review cases in preparation for hearing; review Becca Gallup's research on motion to strike and perform additional research; draft ConforMIS protective order; e-mail update to team	JDP	6.20
11/15/12	Research and draft legal memorandum regarding counterclaims	RHG	5.20
11/15/12	Attention to emails from M. Boersch regarding acceptance of service of subpoenas; emails from S. Bovarnick regarding M. Boersch; attention to file	JFC	1.00

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
11/16/12	Prepare for 11/19 hearing on motion to quash/motion to dismiss	JDP	0.90
11/16/12	Research for and draft legal memorandum regarding counterclaims	RHG	1.70
11/16/12	Review order from J. Almond excusing attendance of counsel; attention to emails	JFC	0.20
11/18/12	Prepare for November 19 hearing on motion to quash and motion to amend counterclaim	JDP	4.40
11/19/12	Prepare for and participate in hearing on motion to quash and motion to amend; draft proposed order on motion to quash; investigate issue with Union Bank subpoena	JDP	6.30
11/19/12	Prepare for hearing; attend hearing on Motion to Quash Subpoenas and Motion to Amend Answer and Counterclaim; review emails from S. Bovarnick	JFC	3.10
11/20/12	Conference with John Bowen; review California motion to quash and analyze possible responses; attention to transmittal of draft order regarding motion to quash; e-mails with ConforMIS regarding protective order and order on motion to quash	JDP	2.40
11/20/12	Review emails from S. Bovarnick; review motions to quash subpoenas in California; follow up regarding same; review orders entered by court regarding hearing yesterday; follow up with S. Bovarnick; email to S. Bovarnick; telephone call from [REDACTED]	JFC	1.70
11/21/12	Research sanctions motion; analyze strategy for responding to motion to quash and deposition; conference with Unionbank regarding subpoena; finalize Conformis protective order and motion for entry	JDP	0.90
11/21/12	Attention to motions to quash and strategy regarding California action	JFC	0.50
11/26/12	Review N.D. Cal. docket pertaining to motion to quash	JDP	0.20
11/26/12	Review order referring matter to magistrate judge; review ConforMIS confidentiality protective order; follow up regarding same; review email from M. Russo regarding confidentiality order	JFC	0.80
11/27/12	Attention to emails from S. Bovarnick	JFC	0.30
11/28/12	Attention to receipt of Bowen deposition transcript and transmittal to client	JDP	0.20

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
11/28/12	Review email from J. Dorsey regarding conform MIS confidentiality protective order; review deposition transcript of J. Bowen; review email from S. Bovarnick with attached discovery guidelines	JFC	1.60
11/29/12	Review and make edits to O'Brien draft of confidentiality protective order; summarize status of outstanding subpoenas	JDP	2.50
11/29/12	Review consent confidentiality order; emails from S. Bovarnick regarding same; attention to file	JFC	0.80
11/30/12	Prepare quarterly status update; attention to Judge Spero's California order re motion to quash	JDP	0.30
11/30/12	Attention to quarterly update; review order to meet and confer with counsel to K. O'Brien sent by S. Bovarnick; attention to docket	JFC	0.30

Total Hours for Matter 00051

94.00

Total Time for Matter 00051

\$25,754.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Partners</b>			
Coffey, James F.	31.80	\$360.00	\$11,448.00
<b>Associates</b>			
Gallup, Rebecca H.	8.80	230.00	2,024.00
Persky, Jonathan D.	53.40	230.00	12,282.00

Total Time for Matter 00051

\$25,754.00

Total for Services

\$25,754.00

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**Summary of Disbursements and Other Charges**

<u>Date</u>	<u>Description</u>	<u>Total</u>
10/31/12	Computer Aided Research	47.50
11/01/12	Westlaw	17.73
11/06/12	Westlaw	22.13
11/07/12	Westlaw	60.82
11/15/12	Lexis	456.00
11/15/12	Westlaw	202.48
11/16/12	Westlaw	3.53
11/18/12	Westlaw	71.75
11/19/12	Westlaw	35.28
11/20/12	Federal Express	17.33
11/21/12	Westlaw	25.98
<b>Total Disbursements and Other Charges</b>		<b>\$960.53</b>

Total of This Bill

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